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December 21, 2007

Mr. Randy McManus
2295 Needham Road, Suite 49
El Cajon, CA 92020

RE: Results of a directed RPO Wetland Survey for the Sundale Subdivision Project, TM 5466

Dear Randy:

This report presents the results of a directed Resource Protection Ordinance (RPO) wetland survey of the Sundale Subdivision project site (TM 5466). The project site is located at 1612 Hillsdale Road in the Valle de Oro area of unincorporated San Diego County (Figure 1).

The purpose of this study was to precisely delineate the eastern RPO wetland boundary within Jamacha Creek, a U.S.G.S. "blue-line" drainage that crosses the southwestern corner of TM 5466. Changes to the County's RPO in 2007 have provided more specific guidelines with respect to what constitutes an RPO wetland. As you know, we completed previous biological assessments of this site in April of 2003 and March of 2006.

In order to conduct a directed RPO wetland survey of the TM 5466 project site, Julia Groebner, Associate Biologist, and I visited the property on 18 December 2007. Weather conditions were suitable for surveying, with clear skies, temperatures in the low to mid 60°s, and no wind. Jamacha Creek, both onsite and offsite, was examined for the presence of RPO wetland indicators in order to determine the exact RPO wetland limits. Transects were established at 50' intervals along the length of the creek, where feasible, in order to map the RPO wetland limits. The results of that mapping are illustrated on the attached RPO Wetland Exhibit (Figure 2).

County RPO Wetland Definition

The County recently (2007) revised its definition of an RPO wetland. The older RPO definition was much more inclusive; under the revised definition, many areas that were formerly considered County wetlands are no longer defined as such.

The County's current RPO defines "Wetlands" as follows.

(1) Lands having one or more of the following attributes are "wetlands":
- *(aa) At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places);*
- *(bb) The substratum is predominantly undrained hydric soil; or*
- *(cc) An ephemeral or perennial stream is present, whose substratum is predominately non-soil and such lands contribute substantially to the biological functions or values of wetlands in the drainage system.*

(2) Notwithstanding paragraph (1) above, the following shall not be considered "Wetlands":

(aa) Lands which have attribute(s) specified in paragraph (1) solely due to man-made structures (e.g., culverts, ditches, road crossings, or agricultural ponds), provided that the Director of Planning and Land Use determines that they:

(i) Have negligible biological function or value as wetlands;

(ii) Are small and geographically isolated from other wetland systems;

(iii) Are not Vernal Pools; and,

(iv) Do not have substantial or locally important populations of wetland dependent sensitive species.

(bb) Lands that have been degraded by past legal land disturbance activities, to the point that they meet the following criteria as determined by the Director of Planning and Land Use:

(i) Have negligible biological function or value as wetlands even if restored to the extent feasible; and,

(ii) Do not have substantial or locally important populations of wetland dependent sensitive species.

Results – RPO Wetland Survey

The drainage examined during this survey (Jamacha Creek) flows almost entirely offsite in a southeasterly direction, crossing the southwestern corner of the site before flowing into two large box culverts that run beneath Hillsdale Road. The floodplain is densely vegetated with Southern Willow Scrub (SWS) vegetation that is strongly infused with invasive, non-native species. The SWS is indicated by scrubby Black and Arroyo Willows *(Salix gooddingii, S. lasiolepis)* over an understory of Mule Fat (*Baccharis glutinosa*), Red Apple Iceplant (*Aptenia cordifolia*), and others. Species such as White Watercress (*Rorippa nasturtium-aquaticum*) and Common Celery (*Apium graveolens*) are found in the actual floodway of the drainage. Non-native species that are abundant in the habitat include Mexican Fan Palm (*Washingtonia robusta*), Brazilian and Peruvian Peppertree (*Schinus terebinthifolius, S, molle*), Giant Wild Reed *(Arundo donax)*, Bastard Sandlewood (*Myoporum laetum*), American Agave *(Agave americana)*, and others.

The floodway of the drainage consists of a shallowly incised, meandering channel that varies in width between 6 and 12 feet over most of its length. Outside of the floodway, the land rises to create gentle slopes and a benched area located above the drainage. An Otay Municipal Water District sewer line runs parallel to the western property line at the edge of this bench. The SWS associated with the drainage extends up the slope to the east of the floodway, stopping at a chain-link fence that runs just inside the western boundary of the TM 5466 project site. The SWS tree canopy more-or-less parallels the property line, extending as overhang onto the property in some places. This is illustrated in Attachment A.

County Wetlands

The floodway of the drainage (the area from bank to bank, or between "ordinary high water marks") qualifies as supporting RPO wetlands, as it meets at least one of the criteria in the County's 2007 RPO wetland definition. The benched area that rises above the drainage **does not** qualify as supporting RPO wetlands because it does not meet any of the criteria in the County's 2007 RPO wetland definition for the following reasons:

- The floodplain area above the drainage floodway **does not** support a predominance of plants whose habitat is water or very wet places. Most of the vegetation in this area consists of non-natives, including Red Apple Iceplant, Bastard Sandlewood, American Agave, and Ornamental Yucca (*Yucca* sp.). None of these are plants whose habitat is water or very wet places. However,

the RPO wetland area along the drainage floodway supports a predominance of aquatic species, such as White Watercress and Common Celery, which are hydrophytic.

- The area above the drainage floodway **does not** support a substratum that is predominantly undrained hydric soil. Hydric soils are present in the floodway of the drainage, but the benched floodplain area above it appears support non-hydric loams.

- The upper benched floodplain areas **do not** consist of an ephemeral or perennial stream, whose substratum is predominately non-soil. The slopes are located physically above the RPO wetland area, although they are within the 100-year floodplain.

Conclusions and Recommendations

The revised RPO requires a biological buffer that extends outwards at least 50 feet from the limits of any RPO wetland. Figure 2 illustrates the RPO limits as we have mapped them and the recommended 50-foot RPO wetland buffer. Figure 2 also depicts a Limited Building Zone Easement (LBZ) extending 80 to 100 feet outward from the limits of the wetland buffer, which is recommended in order to prevent fire clearing impacts within the wetland buffer.

The placement of an open space easement over this area will adequately protect all on and offsite RPO wetlands and the associated SWS, and reduce all potential wetland impacts to "less than significant", as defined by the California Environmental Quality Act.

Thank you for the opportunity to provide this study. Please contact us should you need further information or clarification.

Sincerely

Vincent N. Scheidt, MA
Certified Biological Consultant

Julia L. Groebner, BS
Associate Biologist

Attachments: Figure 1. Site Location
Figure 2. RPO Wetland Exhibit
Attachment A. Site Photos showing RPO Wetlands and associated SWS

Figure 1. Site Location – TM 5466, Valle de Oro
Portion of the U.S.G.S. "El Cajon" 7.5' Quadrangle Map

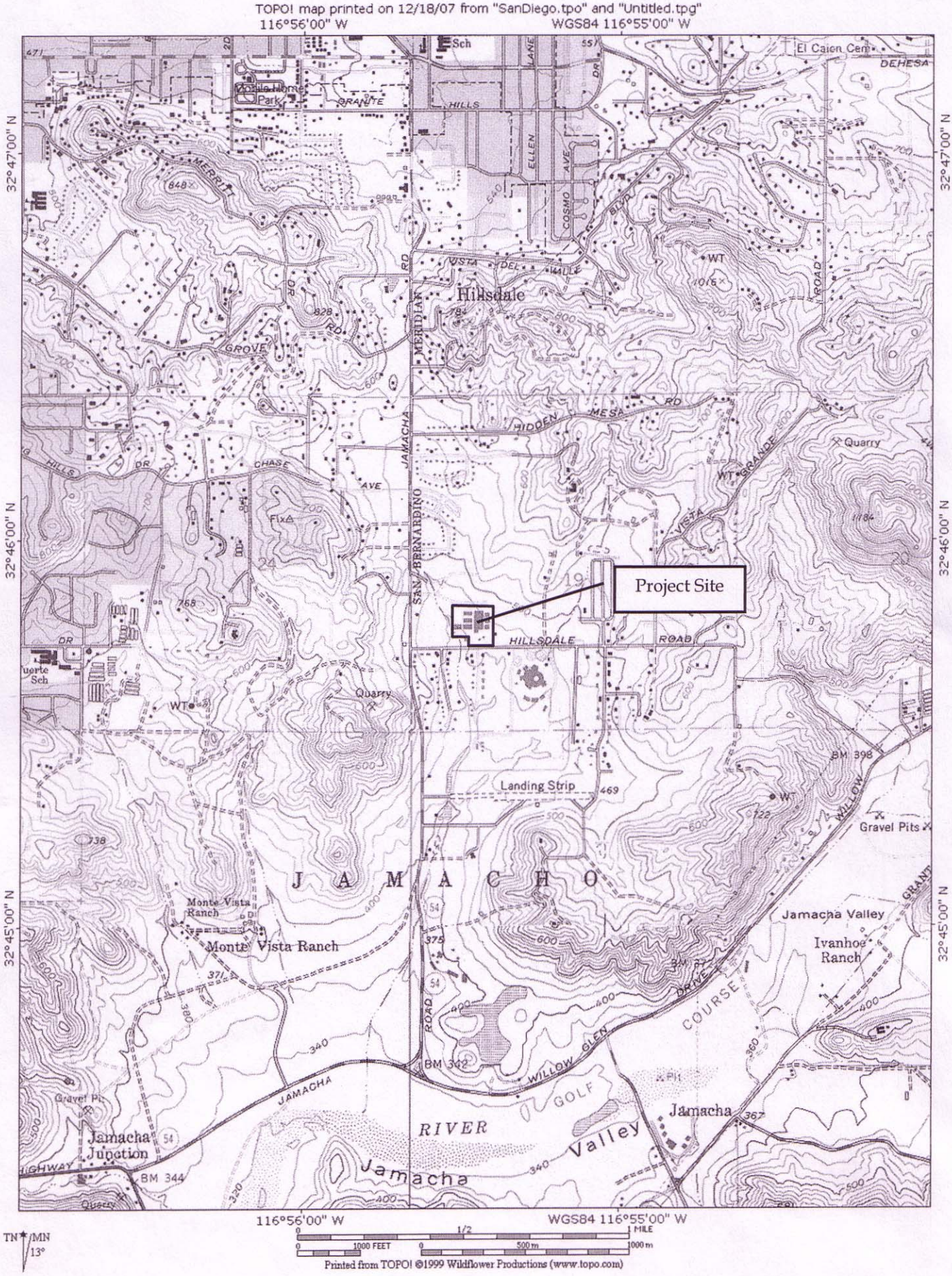
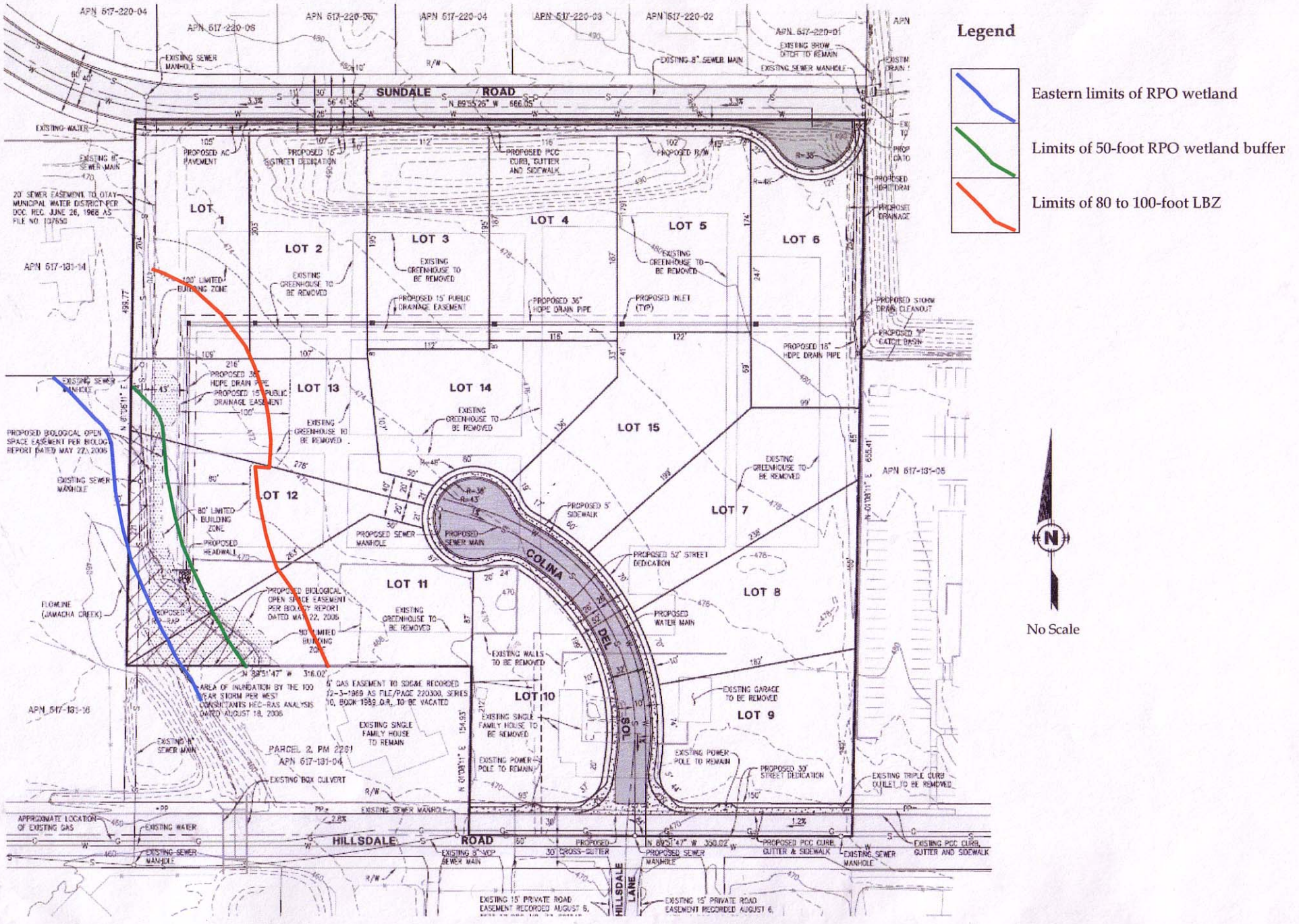


Figure 2. RPO Wetland Exhibit



Attachment A. Site Photos showing RPO Wetlands and associated Vegetation

Photo 1. Photo of Jamacha Creek, looking south, where it runs just offsite near the middle of the western property boundary. Plants growing in the floodway at this point include White Watercress, Common Celery, Mule Fat, and Mexican Fan Palm. Note that the drainage consists of a shallowly- incised channel that is approximately 10 feet wide in this location.

Photo 2. Photo taken from the same location as above, looking east (away from the drainage) and towards the chain-link fence that runs inside the western property boundary. In this location, the slope above the drainage supports Red Apple Iceplant, Peruvian Pepper, Bastard Sandlewood, Ornamental Yucca, and American Agave, all of which are upland species. Straggly seedling willows are present in this location, although the predominance of the vegetation is clearly non-wetland. This area does not qualify as RPO wetlands.

Photo 3. Photo looking north along benched area. Note man-hole above sewer line and ornamental vegetation. The canopy in this location consists primarily of Bastard.Sandlewood. The RPO wetland is located to approximately 20 feet to the left of this picture at this location.

Photo 4. Photo taken from the central part of the property looking west, showing willow canopy of the SWS as it runs up the slope above the sewer line and over the fence. No willows are growing in close proximity to this fence – the vegetation above consists entirely of canopy overhang. The trunks of the willows shown in this photo are actually growing within 10 feet of the drainage.